

FILED

CUAUHTEMOC ORTEGA (Bar No. 257443)  
Federal Public Defender  
SHANNON COIT (Bar No. 298694)  
E-Mail: Shannon\_Coit@fd.org  
RYAN SHELLEY (Bar. No. 337528)  
E-Mail: Ryan\_Shelley@fd.org  
Deputy Federal Public Defenders  
321 East 2nd Street  
Los Angeles, California 90012-4202  
Telephone: (213) 894-4784  
Facsimile: (213) 894-0081

2025 MAY 19 PM 2:45

CLERK OF DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
LOS ANGELES  
ORIGINAL

Attorneys for Defendant  
MAKSIM ZAITSEV

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
WESTERN DIVISION**

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
MAKSIM ZAITSEV,  
  
Defendant.

Case No. 2:25-cr-00154-SPG

**EXHIBITS D AND G IN SUPPORT  
OF MOTION TO DISMISS  
INDICTMENT FOR GOVERNMENT  
MISCONDUCT (DKT. 91)**

Maksim Zaitsev, through his counsel of record, Deputy Federal Public Defenders Shannon Coit and Ryan Shelley, hereby submits Exhibit D and G, which are surveillance videos, in support of his Motion to Dismiss the Indictment for Government Misconduct (Dkt. 91) for the Court's consideration in this case.

Respectfully submitted,

CUAUHTEMOC ORTEGA  
Federal Public Defender

DATED: May 19, 2025

By /s/ Shannon Coit

Shannon Coit  
Ryan Shelley  
Deputy Federal Public Defenders  
Attorneys for Maksim Zaitsev

**PROOF OF SERVICE**

I, Amadeus Duran, declare that I am a resident or employed in Los Angeles County, California; that my business address is the Office of the Federal Public Defender, 321 East 2nd Street, Los Angeles, California 90012-4202, Telephone No. (213) 894-2854; that I am over the age of eighteen years; that I am not a party to the action entitled above; that I am employed by the Federal Public Defender for the Central District of California, who is a member of the Bar of the State of California, and at whose direction I served a copy of the attached **EXHIBITS D AND G IN SUPPORT OF MOTION TO DISMISS INDICTMENT FOR GOVERNMENT MISCONDUCT (DKT. 91)** on the following individual(s) by:

☒ Placing  
same in a sealed  
envelope for  
collection and  
interoffice delivery  
addressed as  
follows:

☐ Placing  
same in an  
envelope for hand  
delivery addressed  
as follows:

☐ Placing  
same in a sealed  
envelope for  
collection and  
mailing via the  
United States Post  
Office addressed as  
follows:

☐ Faxing  
same via facsimile  
machine addressed  
as follows:

**Rahul R.A. Hari**  
**Assistant United States Attorney**  
**312 North Spring Street**  
**Los Angeles, California 90012**  
**E-mail: rahul.hari@usdoj.gov**

**Neil Thakor**  
**Assistant United States Attorney**  
**312 North Spring Street**  
**Los Angeles, California 90012**  
**E-mail: neil.thakor@usdoj.gov**

This proof of service is executed at Los Angeles, California, on May 19, 2025.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

/s/ Amadeus Duran  
Amadeus Duran

